



REPLY TO:
LIMETREE BAY, LLC
1 Estate Hope
Christiansted VI 00820-5652

August 26, 2020

Director
Division of Environmental Protection
Department of Planning & Natural Resources
45 Mars Hill
Frederiksted, St. Croix, V.I. 00840-4474

**Subject: Title V Permit No. STX-TV-003-10 Six Month Deviation Report
January 1, 2020 through June 30, 2020**

Dear Director:

Limetree Bay Terminals, LLC (Limetree Bay Terminals) and Limetree Bay Refining LLC (Limetree Bay Refinery) are submitting this report in accordance with Section 8.13.1 of the above referenced Title V Permit. The permit was issued to HOVENSA, LLC. by VIDPNR on July 1, 2010 and was transferred to Limetree Bay Terminals on March 9, 2016. Limetree Bay Refining elected by letter dated May 29, 2019, to be added as co-permittee to the TV permit pursuant to authority granted in the Refinery Operating Agreement with the Government of the Virgin Islands. This report addresses all deviations from required monitoring as specified by the permit. The deviations and associated information are presented in table format in the enclosed Attachment A.

Additionally, the 6-month compliance schedule progress report is included as Attachment B. The progress report covers those compliance schedules that remain incomplete. However, Limetree Bay Terminals and Refining was in compliance during this semi-annual period with the applicable requirements of the Title V permit referenced in these compliance schedules because of refinery idling. The certification by a responsible official required by Section 8.8.2 is enclosed as Attachment C.

If you have any questions or comments regarding this report, please contact Catherine Elizee at (340) 692-3073.

Sincerely,

Jeffery Hersperger
Sr. Vice President

Sincerely,

Robert Weldzius
Sr. Vice President

JH/RW/CE/sm/ts

Attachments

Cc: Verline Marcellin w/attachments

LIMETREE BAY TERMINALS, LLC
LIMETREE BAY REFINERY, LLC

ATTACHMENT C – Certification by
Responsible Official of Attachments A and B

Title V Six Month Deviation Report

For the Period
January 1, 2020 – June 30, 2020

Based upon information and belief formed after reasonable inquiry, I certify that the statements and information contained in Attachments A and B are true, accurate, and complete.



Jeffery Hersperger
Sr. Vice President

8-25-20

Date



Robert Weldzius
Sr. Vice President

8/25 / 20

Date

Title V - Attachment A

6-Month Deviation Report: January - June 2020

Description of Deviation	Permit Condition No.	Permit Condition	Plant Area	Process Unit	Source ID (from TV Permit Table 1)	Deviation times and duration
None						

Attachment B

Title V Six Month Compliance Schedule Progress Report Update - Deviation Status Report Out Please note that all refinery specific processing units were idled during the first quarter of 2012.

TV Schedule	Project	Corrective Action	Construction Completion	Full Compliance	Status	Progress to Date
No. 4	Boilers 5, 8 & 9 Subpart D compliance	Install equipment necessary to comply with Subpart D requirements	7/31/2012	7/31/2012	Open	Boiler 8 and Boiler 9 LNB installed and CEMS installed. Compliance demonstration scheduled 3rd or early 4th qtr 2020. B5 remains idle.
No. 6	GT's 1-9 NO _x , O ₂ CEMS NSPS GG Compliance	Install CEMS, comply with GG standards	6/7/2016 ⁽¹⁾	6/7/2016 ⁽¹⁾	Closed	GTs 1, 2, 3, 5 and 6 are permanently shut down. GT 4 was tested in 2016 and complies with GG limits, GT's 7 and 8 have installed combustion liners sufficient to comply with GG. .
No. 8	NSPS NNN	Submit AMP	Dependent on AMP approval	Dependent on AMP approval	Open	Waiting on AMP approval. Affected source now idle.
No. 16	Penex compressor engines and 5 DD 40 CFR 63 Subpart ZZZZ	Add pressure monitoring device and thermocouple on catalyst beds	6/3/2013	12/3/2013	Open	Penex compressor engines will be restarted and the required monitoring devices will be installed prior to restarting PENEX. 5DD is not included in the current refinery restart.

⁽¹⁾ Five years from consent decree date of entry



LIMETREE BAY
T E R M I N A L S

Verline Marceline
Division of Env. Protection
VT DPNR
45 Adams Hill
FREDRICKSTED, USVI 00840-4474



LIMETREE BAY
T E R M I N A L S

Verline Marceline
Division of Env. Protection
VT DPNR
45 Adams Hill
FREDRICKSTED, USVI 00840-4474

